

JILL W. BLEY, PH.D., INC.

Clinical Psychologist
 730 Red Bud Avenue
 Cincinnati, Ohio 45229
 Telephone 513/961-8788 Fax 513/221-7758

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PSYCHOLOGICAL EVALUATION
 CONFIDENTIAL

NAME: Teresa Readnower

DATE OF BIRTH: 7-17-65

AGE: 37

REFERRAL: Megan E. Clark, Attorney

PROCEDURE: Clinical Interviews: 8-05-02 2 hr.
 8-14-02 1 1/2 hr.
 8-28-02 1/2 hr.

Minnesota Multiphasic Personality
 Inventory-2: 8-05-02
 Life History Questionnaire: 8-05-02
 Medical History: 8-05-02
 Evaluation of Lifetime Stressors: 8-05-02
 Anxiety Source Profile: 8-14-02
 Beck Depression Inventory: 8-14-02
 Posttraumatic Stress Diagnostic
 Scales: 8-14 & 28-02
 Trauma Symptom Inventory: 8-14-02

DOCUMENTS REVIEWED:

Complaint With Jury Demand, Case No. C-1-01-654,
 Filed Sep 26, 2001
 Affidavit, filed with the EEOC March 27, 2001
 Deposition of Teresa Readnower taken May 9, 2002
 Medical Records from Philip Diller, M.D. and John M.
 Roberts, M.D.
 Records from Court of Common Pleas, Hamilton County,
 Ohio, dated 5-4-00, 9-8-00 and 9-21-00

**DEFENDANT'S
 EXHIBIT**

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REFERRAL

Her attorney, Megan Clark, referred Ms. Teresa Readnower for a psychological evaluation. The purpose of the evaluation was to determine whether or not Ms. Readnower is experiencing the symptoms commonly observed and described in the psychological literature on discrimination and sexual harassment.

RESULTS OF CLINICAL INTERVIEWS

Ms. Readnower is a 37 year-old Caucasian woman. She was well groomed and appropriately dressed. She was prompt for her appointments and cooperative throughout the evaluation. She was informed that under most circumstances the information disclosed by a client/patient to a psychologist is privileged and confidential. However, when a person is involved in litigation and agrees to a psychological evaluation for the purposes of said litigation, the person as litigant or defendant waives his/her right to assert privilege and/or confidentiality. Ms. Readnower indicated that she understood that the information she disclosed during this evaluation would not be confidential or privileged by reading and signing two forms that explained the waiver.

Ms. Readnower stated that she has been employed by General Ionics as a telemarketer twice. The first time was from 1983 until 1985. She said that she stayed until she was pregnant with her son. She missed a lot of work during the pregnancy and her supervisor Annette told her that she was going to put her on part time. Ms. Readnower said that Annette told her that she did not like her. She wasn't sure, but she thinks that they terminated her at that time. After her son was born she worked part time at another job but it "didn't work out". In 1989 she saw an ad for telemarketers at General Ionics. She applied there again and was rehired in 1989. She was there until January of 2001. "My doctor, Dr. Diller, put me on a medical leave (FMLA) for 'extreme anxiety disorder' from October, 2000 to January 2001. When it was over in January they set up a meeting with the 'big wigs' from the Pittsburgh office, Dave McKinley, Assistant to the Vice President, and Julie Seager from Human Relations. I had gone to Dave McKinley for help."

Ms. Readnower said, "Initially, the work was great. I take that back. At the beginning of my employment they still had Annette Birkely as the supervisor. I rode it out and she was fired and I was promoted to her position. Carol Carothers was equal to me. The promotion was around 1991. Things were good. I felt good about myself. I don't ever remember not being happy until Dan Goins took over. There were difficult times that caused me to have to work double shifts, but I liked the work even though I was tired. Dan Goins had been a sales representative and was promoted to Assistant General Manager. Daryl Brandenburg was my boss. He was the General Manager. We worked really well together. We both had the same work ethic and similar management styles. At that time Dan caused me some problems but he couldn't fire me. Dan became

General Manager because Darryl left and started his own business. We discussed my going with him but he agreed not to take key players with him. I was considered a key player. Within three months I was on FMLA".

"The biggest thing was that from the day he took over he was on me and I knew that he was going to get me out. He would walk into my department and he would ask me a question and when I started to answer he would turn his back on me and talk to someone else. Every day I was very stressed not knowing if I was going to have a job, very stressed. I started having a lot of bowel movements. I would eat and it would go right through me. The doctor ordered a colonoscopy. He put me on a prep dosage for the test. The dispatcher was on vacation. I was supposed to work two shifts to cover. He wanted me to change my dosage schedule and take it at night. He kept saying that he did not know why I couldn't change my dosage schedule because he needed me there. I had trained my assistant the night before so her assistant could do it. I had my doctor fax a letter about the dosage schedule. He wanted me to come in the day of the colonoscopy. I said that I would try, but I couldn't and the doctor told me to stay home. Dan called me at home to give me crap about not being in the office. I called to say that I couldn't come in. He wouldn't take the call. You have to call so they can hear your voice, that is the rule. I spent all day calling to talk with him. He kept me on hold for twenty minutes. I finally talked to him. After all the crap he gave me, he said, 'That's fine. Just take care of yourself. He is one of the most vindictive people I have ever met. He's a typical pig.'"

"He has asked me questions like, 'Are you putting weight on? Your ass is looking good'. This was years ago before he was the manager. Darryl was on vacation. Dan buzzed and asked me to come to his office. He had an issue of Sports Illustrated. He said, 'Come here. Look at this'. He was flipping through the Swim Suit issue. He said, 'Look, she doesn't have anything on you'. He kept making comments comparing my body to the models. Then he would ask something about business and I left. Disrespect and talking down to me was daily, every single day. An example of his disrespect, I was in Dan's office one day and the school nurse called and said that my son had hurt his ankle and they had sent him home on the school bus. Then my son called from home. He was yelling that his ankle was broken. My son was upset. Brian Huckstetd was there and made a comment about whether my son was okay. Dan made me stay there another forty minutes and listen to mostly irrelevant numbers and stuff until I finally said I had to leave. I left. I ran to the time clock and then ran out and I could see in his office. With a smirk on his face he said, 'Running a little late. Are you?' After my colonoscopy I told him that the doctor said that 95% of the problem was from stress and 5% was due to my diet. He said, 'It sure seems like you are under a lot of stress since I took over. Am I stressing you out?' Then he did something that was more like a laugh than a smirk."

"There was an incident before he took over as the General Manager that happened at a hotel where we stayed for the awards banquet. At 3 or 4 AM I woke up and went to find the vending machines to get a drink. As I am walking

down the hall he was backing out of his door with two wineglasses in his hand. He said, 'Hey'. I said, 'Hi, Dan'. He opened the door to the room across the hall. He told me to come in and I looked in the room and saw a wine bottle. I said, 'No'. I went back to my room and told my roommate, Trish, who is a part time worker. Another time Dan asked me to go to a hotel with him to do a presentation for a promotion. It was about gift certificates for a home owner if they let us test their water. Dan asked me to go along. I had jeans on and didn't think I looked right for a sales presentation. He said it was okay. When we were there he didn't let me say a word. Later I complimented him about his sales presentation and asked why he didn't let me talk. He said, 'I didn't bring you here for you to talk. I am hoping he looks at you like the banker did'. That is something that became a joke in the office and he knew about it. Back when I bought my house a banker was flirtatious with me and he would call me at work periodically. So he just was using me as an object. Dan had a sneaky way of looking you up and down and making you feel degraded like a sex object instead of a person. He would do that while talking to me or while I was walking by him. Dan use to grab himself often as a way of trying to draw your attention to his crouch. That happened almost daily. It was like always rearranging his penis."

"I had panic attacks on my way to work. The panic attacks started often by my thinking as I was driving in to work, 'Could this be my last day?' He was making accusations about me that were not true, but there was no way to argue or defend myself. I knew he was trying to get rid of me. The people in the front office, secretaries and two service guys, started coming to me and told me to watch my back because Dan was going to 'off' me. Barry or Roger, probably Barry said he overheard at a night club Dan offer some girl my job. The girl said that she thought that he already had a supervisor. He said, 'Not for long, I'm getting rid of her'. It started the day he took over and it was a daily thing."

"I had conversations with him about not being able to communicate. He didn't like the fact that I had an opinion about anything. I was running my department successfully. He came in and made changes in my department. I would express my opinion. He would ask me why I argued with him. He accused me of being disrespectful and argumentative. I tried to talk to him about working with him and the need for him to understand that we needed to work together and communicate. I finally went over his head and called Jack Bredel, the Vice President. He said that he was ready to retire. I had known him for many years. I believed that he would help me. I asked for help. He asked if the problem was with Dan and I said, 'Yes'. He told me to write everything down and he would discuss it with me. I faxed the written report. He didn't say a word about it. I called him back. He said that he discussed it with Dave McKinley and he is going to take care of it."

"He faxed my letter to him. That is when the big trouble started. McKinley called Dan. Dan called me to his office and said bring a notebook. Dan told me that I had just made the biggest mistake of my life by going over his head. I told him that I tried to talk to him about this before. He said, 'You don't get it. Do you?

This is my office. It runs the way I say. Get out your pen. You are going to work 2 to 9 from now on'. Those are all night shifts. He took away one Saturday off. He knew that I couldn't work nights because I was a single mother. He wrote me up for, I think, insubordination. Shortly after that I went on medical leave. I did follow the chain of command. Darryl and I had mutual respect. My ex-husband showed respect. Dan is the first person to ever treat me that way."

SOCIAL HISTORY

Ms. Readnower was born in Rockford, Illinois July 17, 1965 to Joe and Shirley Wall. Her parents were divorced when she was 15. Her father was in the Navy so he traveled a lot. Later, when he left the Navy, he continued to travel a lot because he was a photographer. When she was age 5 the family moved to Reading, Ohio and later they built a house in Loveland, Ohio. She had two sisters, Terry and Sherri and one brother, Joey.

She described her father as "somewhat able to show love. There was a lot of unspoken anger between Mom and Dad. He is remarried and is very happy now. It was like night and day. Dad was gone a lot. He disciplined with a lot of lectures. I got my butt whopped once. When Dad was angry and frustrated with all of us, when my brother and sister got into fights, he usually sat down and talked logically about it to us. I don't remember being disciplined that often. Dad taught a work ethic. He is a workaholic."

She said that her mother was "somewhat distant and mostly preoccupied. She had a lot of health problems. She was not too affectionate. Mom died in 1996 of renal failure and complications of surgery".

Ms. Readnower started school at age 6 when she attended Lloyd Mann Elementary School in Loveland, Ohio. She went there from K through sixth grades. She attended Loveland Hurst Junior and Senior High School from the seventh through the twelfth grades. She did not finish high school because when her parents divorced, when she was 15 years old, she lived with her mother. Her mother remarried and she went to live with her father and stepmother in a different school district. She only lived with them for a short time because she did not get along with her stepmother. She got her own apartment at age 17 and went to work doing factory work at Cinpak. She only had 2 credits to complete in order to get her diploma. She has never finished.

At age 16 or 17 Ms. Readnower started to date. She went with the same boyfriend through high school. She said that she broke up with him because she got bored, however, they are still good friends. She met Scott Readnower when she was 22 years old. They were together for 13 years. They were married during the last 3 years, from 1996 to 1999. They divorced because he had an affair. Her son, Wesley, was born in 1989. He is 13 years old. She said that she gets along okay with her ex-husband because of their son. "I ended the marriage. I wanted the divorce. I was relieved. It made my life better. He had a six-year affair. I didn't

have any money problems with the divorce. As a matter of fact, that year of the divorce was probably the most stress free time of my life." She stated, "There have been no other significant relationships. There was not much time to date because of my hours at GI".

Ms. Readnower's first job was doing factory work at Cinpak. She only worked there a very brief time because the supervisor put her at the front of the line and the boxes were too heavy for her. She sustained a back injury. Then she went to Luxbury Lodge Hotel where she started out cleaning rooms and ended working the front desk. She left there after two years because she wanted a different job. She went to General Ionics as a telemarketer, became pregnant, had attendance problems, was put on part time status and then quit. After her son was born she worked for a few months for Colorado Prime doing telemarketing. She left because; "It was real unprofessional. The supervisor was about 17 years old. When the owner was gone, she goofed off. It was not my idea of working at a job.

She left to take a job at General Ionics again. After that she said, "I was on my couch for one year. I was depressed, to say the least. I am extremely ashamed of it. My car got repossessed, my house went up for foreclosure two times. I lived on my profit sharing and retirement for a little while. Then my family helped me. About eight months after I was fired from General Ionics, Darryl, my old boss, was calling me for advice about setting up phones as part of marketing. He hired me. I started June 25, 2001. In July and August business was great. After 9/11 business dropped. He let me go. He said that since it was his company he needed to understand how the marketing department worked. He was paying me really well, \$18 an hour with full benefits and \$65 for sales. It smashed me. I didn't understand. He called me and asked if I was all right. I said, 'No, I just lost a job I thought I would have all my life for the second time'. He used to test people's commitment and he wanted me to fight for my job. I think he sensed my lack of confidence. I wasn't the same person he had worked with at GI. I wasn't me. Losing that job at GI made me feel incompetent."

After losing her job with Darryl she took a job where she committed to working 8am to 1pm. "I knew I couldn't work 8 to 5. I haven't worked five days one single week since I've been there. I know I have to, but I can't make myself. I feel like I'm still the same person I used to be but I'm not. I feel like two people. I use to stand up and give my opinion. Now I can be shot down and cry. I cry very easily. It doesn't take much. I only eat about once a day. Sometimes there is not much of an appetite. I feel queasy all of the time. Eating is an effort. I sleep hard and long, sometimes 15 hours a day. My son is living at his Dad's house. I'm not going to work, not getting paid. I can't afford to feed him. I feel like sitting on the couch and slowly dying, wasting away. I feel disengaged. I sleep so that I don't think. I have pressure on my chest all the time. When I make an appointment I stress over it. When I have to go I don't want to go. I've never been like this in my life. I feel numb. My identity was with my job. It was every thing I was. They took every thing away from me."

MEDICAL HISTORY

Ms. Readnower indicated on the medical history form that she completed for this evaluation that she is currently experiencing headaches, back pain, fatigue, depression, uncontrollable crying, anxiety/nervousness, digestive problems, panic attacks, problems with concentration and difficulty breathing. She has been taking Valium 3 times a day for four years, Toprol 1 time per day for 1 or 2 years and Zoloft 1 time per day for 1-1/2 weeks. She started seeing a mental health professional this past week.

The medical records from Drs. Diller and Roberts indicated that Dr. Diller; at times did some counseling with Ms. Readnower. His notes document her medical problems pre and post the time that Mr. Goins was her manager. The records corroborate the ratings she gave to her symptoms pre and post the events at General Ionics. She definitely had many physical symptoms before Mr. Goins was her manager. However, there does seem to be an increase in symptoms after Mr. Goins was promoted.

Dr. Diller's notes also indicate that Ms. Readnower was experiencing some intense distress related to her relationship with her ex-husband during the divorce process. According to the record Ms. Readnower told Dr. Diller that her ex-husband came to her apartment and raped her and that she took pictures of her bruises and filed a domestic violence complaint against him. The record also indicates that Ms. Readnower went to AA to deal with a drinking problem. On 8-28-02 these issues were addressed with her. She stated, "I had a restraining order because he was harassing me by phone. He would cry and want to come home. I called the police and asked what to do. The police filed a harassment charge. There were two hearings. I filed the first one (because of the harassment). Shortly after, he tried to have sex with me. I called the police and because there already had been a restraining order, the police filed the second one. The magistrate granted the restraining order. He bruised my arm grabbing me. There was no trauma. He grabbed me and turned me around. He wanted sex. I said, 'no'. I was mad. I made him leave. His affair was six years prior to our divorce. Scott and I separated in July of 1998. The divorce was final August of 1999. At that point it was just the paper work. We agreed on everything then. He didn't fight for money or custody. We have shared parenting. It went smoothly. It was just rocky in the beginning. He didn't want a divorce. He was devastated by it." She said that she was not traumatized by his attempt to have sex with her. She does not know why Dr. Diller called it "rape" in his notes because she did not think of it that way or talk of it that way.

In response to questions about her having a drinking problem she said that there were problems with her teenage son, Wes. He began being very disrespectful to her. She sent him to his Dad's house and told him to decide whether or not he was going to be respectful of her. Her son told his father that she needed to stop drinking. "Yes, I admit that I had 2 or more beers in the evening. I decided that I should stop and go to AA. It was to pacify Wesley and get him back home. There

is no drinking now. I didn't feel like there ever was a problem. I went for a month to AA but I was not able to see a problem. I felt manipulated by my son. I learned a lot about alcohol abuse and realized that my Mom is an alcoholic. A lot of things have happened in my life but nothing ever made me dysfunctional like losing my job. Over the last year I have not been able to work. That is not me. The way I feel is from two years of trying to deal with what happened."

RESULTS OF TESTING

MINNESOTA MULTIPHASIC PERSONALITY INVENTORY -2 (MMPI-2)

The results of the validity scales on Ms. Readnower's MMPI-2 profile indicate that the profile is probably valid. She was somewhat defensive, conforming and virtuous in her approach to the test. The validity scales suggested that she may have strong commitments, lagging attention, be extremely honest in answering the questions, and agitated in the midst of a crisis. A validity scale that measures the responses given to unusual items on the last one third of the test (Fb) indicates that she may have been less able to cope with the test as time went on. She may be moody, restless and unstable at present but she also demonstrated a balance between self-protectiveness and self-disclosure.

The Profile for the Basic Scales indicated that she may feel immobilized by multiple somatic symptoms and complaints, lack energy to cope with everyday activities, appear to be emotionally immobilized, and avoid other people. She shows signs of severe depression, which may include feeling inferior, lacking in self-confidence, difficulty with concentration, attention and memory. She may brood, cry and ruminate and feel that life is no longer worthwhile. She may be feeling alienated, isolated and estranged. She may feel that other people do not understand her and that she has gotten a raw deal from life. She is also feeling very alienated from herself. There is evidence that she is empathic, capable, competent, easy-going, considerate and idealistic. But currently, she may be feeling that she has been unfairly treated and is tending to be suspicious and mistrustful of other people. She may be feeling high-strung, lonely and sensitive, with periods of ruminating, agitation, fearfulness, and anxiety. She may have feelings of unreality, worry excessively, at times, wish she were dead, and have periods of laughing and crying that she cannot control and experience many unusual body sensations. She may feel tense, restless and excited.

The Profile for the Supplementary Scales suggests that she has high anxiety and is experiencing distress in her personal relationships. The two experimental scales that measure Posttraumatic Stress Disorder are extremely elevated.

The Profile for the Content Scales indicate that Ms. Readnower is extremely anxious, obsessive, depressed, has many health concerns, feels angry and feels unable to work due to poor work performance, low self-confidence, concentration difficulties, obsessiveness, tension, pressure and decision-making problems. There is evidence that, currently, she may not be able to benefit from psychotherapy.

BECK DEPRESSION INVENTORY (BDI)

The results of the BDI indicate that Ms. Readnower is suffering from a severe depression.

ANXIETY SOURCE PROFILE

The Anxiety Source Profile is a self-report inventory that lists symptoms related to three sources of anxiety the external environment, and two types of internal sources, endogenous sensations, fears and emotions. Ms. Readnower was instructed to give two responses to each symptom item. She was asked to put an X in the box that represented the degree of anxiety related to that item before the alleged incidents at General Ionics and to put a check mark for the same item to indicate the degree of anxiety she experienced related to that item after the alleged incidents at General Ionics.

On the items related to environmental sources of anxiety Ms. Readnower indicated very few increases in anxiety with the exception of "being criticized, being touched by others, angry people, making decisions, being seen unclothed, procrastination, food, failure and noises". On the items related to internal sensations, feelings and emotions she noted increases in "nausea and vomiting, heart beating fast, tightness of chest, dizziness, tingly feelings, feelings of fainting, trembling, feeling hot or cold, crawling sensations on skin, defecating unpredictably, light-headedness. She has fears of becoming insane, being out of control, panic, making mistakes, making decisions, being unworthy, rejection or disapproval, and going crazy.

She commented about the test, "I feel angry about losing my job with Darryl because I think I would still be there if I had been the same person he used to know. I handled it wrong. I know losing my job wasn't my fault but I felt so humiliated and degraded. Now I don't know what I am capable of anymore".

TRAUMA SYMPTOM INVENTORY (TSI)

The results of the validity scales of the TSI indicate that the profile is valid. The results of the clinical scales show that Ms. Readnower has severe anxiety, is very depressed, has symptoms of dissociation, such as depersonalization, derealization, out-of-body experiences, and psychic numbing. She also has problems in the "self" domain, such as identity confusion, and a relative lack of self-support. Her scores indicate that she tends to present as a classic/uncomplicated trauma victim, often in response to a relatively recent stressor.

POSTTRAUMATIC STRESS DISORDER DIAGNOSTIC SCALE (PDS)

The results of the PDS for her ex-husband's "attempt to have a sexual experience with me but I was not interested" indicate that she has no symptoms of PTSD related to this experience.

The results of the PDS for the incidents at General Ionics indicate that Ms. Readnower is experiencing most of the symptoms related to traumatic stress. However, the incidents sighted as the stressors do not meet the criteria necessary to make that diagnosis.

SUMMARY AND CONCLUSIONS

The results of the Clinical Interviews and the testing indicate that Ms. Readnower is experiencing most of the signs and symptoms commonly observed in victims of Sexual Harassment/Discrimination. The signs and symptoms of sexual harassment/discrimination tend to be observed in stages as outlined below.

STAGES OF SYMPTOMS OBSERVED IN VICTIMS OF DISCRIMINATION/SEXUAL HARASSMENT

CONFUSION/SELF BLAME: Characterized by

- Ignore the harassment
- Joke about the behavior
- Politely refuse
- Believing it will stop
- Feeling humiliated
- Feeling embarrassed
- Feeling guilty

FEAR/ANXIETY: Characterized by

- Problems with concentration
- Motivation Problems
- Work performance and attendance problems
- Problems with relationships
- Feelings of helplessness, trapped
- Fear of reprisal in the form of negative
employment decisions (discharge/demotion)
- Hypervigilance ("paranoia")
- Fear about career
- Physical symptoms
 - Sleep disturbances
 - Headaches
 - Fatigue

Stomach problems (gastrointestinal distress)
Jaw tightness/teeth grinding
Self-esteem/confidence threatened

DEPRESSION/ANGER

Erosion of self-esteem to crisis proportion
Discounting of abilities
Questioning if can ever work again
Recognition of violation of rights
Fury-self doubt-fury-self doubt
Take steps to control
 Report to upper level
 File complaint
 File lawsuit
Withdrawal of support from co-workers
Uncontrollable crying
Agitation
Deterioration of personal relationships

DISILLUSIONMENT

Question view of world and values about:
 Fairness
 Justice
 Loyalty
Low self-esteem, confidence

THE SEVERITY OF THE SYMPTOMS USUALLY DEPENDS ON:

- INTENSITY
- DURATION
- FREQUENCY
- SERIOUSNESS OF DISCRIMINATION/HARASSMENT BEHAVIOR
- SUPPORT OF CO-WORKERS
- RESPONSIVENESS OF EMPLOYMENT ENVIRONMENT FOLLOWING COMPLAINT

CONFUSION/SELF BLAME

During her spontaneous rendition of the incidents at General Ionics, Ms. Readnower described her attempts to ignore the harassment, refusing to accept it, believing that it would stop and feeling humiliated and embarrassed by his behavior in front of her employees and when asked to accompany him on a sales call. She also felt guilty that somehow she was doing something wrong and should be able to correct it.

FEAR/ANXIETY

She described having multiple problems with her health due to stress, including fatigue, gastrointestinal distress, sleep disturbances and headaches. She stated that she feared losing her job every day as she drove to work and this caused anxiety attacks to worsen. Her work performance and attendance were effected by her somatic problems caused by the stress. She stated that she felt fearful and helpless because she needed her job. She was hypervigilant (on the lookout) for criticism and situations that would humiliate her. Her self-esteem and self-confidence were definitely threatened.

DEPRESSION/ANGER

Ms. Readnower described feelings of inadequacy and loss of her self respect and esteem. She felt that her abilities were constantly being discounted and wasn't sure if she would be able to go back to her job and work while she was on FMLA. She knew that her rights were being violated and she attempted to take steps to report the problems to upper management. When that failed she went to a lawyer. She reported uncontrollable crying, agitation and signs of withdrawal.

DISILLUSIONMENT

She spontaneously expressed her belief that a strong work ethic, which included fairness, justice and loyalty, would be rewarded and that she has been disillusioned by the behaviors of the management at General Ionics. Her self-esteem and self-confidence were seriously effected.

SEVERITY OF SYMPTOMS

Intensity of the harassment was mild to moderate

Duration was moderate: three months

Frequency was daily

Seriousness of the behaviors was mild to moderate

There was some support of co-workers

The employment environment was not supportive. After she complained to upper management about the behaviors she was terminated.

Therefore, her symptoms were greatly exacerbated

The diagnoses for Ms. Readnower are:

AXIS I 309.24 Adjustment Disorder with Mixed Anxiety and
Depressed Mood

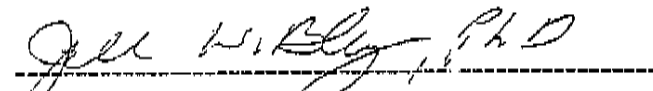
AXIS II N/A

AXIS III Multiple physical symptoms

AXIS IV Stressors related to loss of job, domestic issues and litigation

AXIS V GAF = 55

It is my opinion within a reasonable degree of psychological certainty that Ms. Readnower is suffering from the symptoms commonly observed in victims of sexual harassment and discrimination. It is also my opinion that there was a pre-existing condition of severe anxiety due to childhood events related to her mother's alcoholism and/or to the stress and disappointments experienced in her marriage. The discrimination she experienced from Mr. Goins and the subsequent retaliation she experienced from General Ionics upper management after she reported the discrimination to them, triggered a severe stress reaction and also triggered pre-existing symptoms.


JILL W. BLEY, PH.D.

9-13-02

DATE